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Attorneys for Plaintiff
LOTES CO., LTD.

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

LOTES CO., LTD.,
Plaintiff and Counterclaim Defendant,
v.
HON HAI PRECISION INDUSTRY CO.,
LTD., and FOXCONN ELECTRONICS, INC.,
Defendants and Counterclaimants.

Case No. 3:11-cv-01036 JSW

**STIPULATION TO EXTEND
REMAINING BRIEFING
SCHEDULE FOR DEFENDANTS'
MOTION FOR PRELIMINARY
INJUNCTION, AND ~~PROPOSED~~
ORDER THEREON**

The Hon. Jeffrey S. White
United States District Judge

1 Pursuant to Civil Local Rules 6-1(b), 6-2, and 7-12 and Federal Rule of Civil Procedure
2 15, Plaintiff Lotes Co. Ltd. ("Plaintiff") and Defendants Hon Hai Precision Industry Co., Ltd. and
3 Foxconn Electronics, Inc. ("Defendants") (collectively "the Parties") hereby agree and stipulate,
4 through their respective counsel of record, as follows:

5 1. Defendants filed their Motion for Preliminary Injunction ("Motion") with this
6 Court on June 26, 2013.

7 2. The parties previously stipulated to continue the dates filing and service of the
8 opposition and reply papers. The Court granted the parties' stipulated request, and on August 12,
9 2013, the Court set the date for Defendants' Reply to September 13, 2013. On August 14, the
10 Court continued the hearing on the motion for preliminary injunction from October 11 to
11 November 15, 2013.

12 3. Good cause exists to extend the reply deadline because Defendants need additional
13 time to obtain information responsive to Lotes' arguments from Defendants' employees who are
14 located in Taiwan, many of whom do not speak English, which slows down the back-and-forth
15 communications with its California-based counsel.

16 4. Defendants stipulate and agree that if Defendants submit new evidence with their
17 reply, then Lotes may file a surreply, within ten days of the filing and service of Defendants'
18 reply.

19 5. The hearing on Defendants' preliminary injunction motion, currently scheduled for
20 November 15, 2013 shall remain unchanged.

21 6. Therefore, the parties stipulate and agree that the deadline to file and serve
22 Defendants' Reply shall be extended to September 27, 2013, and that any surreply by Lotes shall
23 be due on or before October 7, 2013.

24 ///

25 ///

26 ///

1 IT IS SO STIPULATED.

2 Dated: September 10, 2013

JONES DAY

3 By: /s/ Gregory L. Lippetz

4 Gregory L. Lippetz

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11 HON HAI PRECISION INDUSTRY CO., LTD. and

12 FOXCONN ELECTRONICS, INC.

13 Dated: September 10, 2013

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22 LOTES CO., LTD.

ATTORNEY'S E-FILING ATTESTATION

As the attorney e-filing this document, and pursuant to General Order 45, I hereby attest that counsel for Plaintiff/Counterclaim Defendants Lotes Co., Ltd. whose electronic signature appears above has concurred in this filing.

Dated: September 10, 2013

JONES DAY

By: /s/ Gregory L. Lippetz

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Attorneys for Defendants/Counterclaimants
HON HAI PRECISION INDUSTRY CO., LTD. and
FOXCONN ELECTRONICS, INC.

~~Pursuant to the Parties' stipulation, and good cause appearing therefor, IT IS SO ORDERED.~~

Dated: September 13, 2013



for

Hon. Jeffrey S. White

Pursuant to the parties' stipulation, Defendants shall file their reply no later than September 20, 2013. If Lotes seeks to file a sur-reply, Lotes shall seek leave of Court to do so.

SVI-132003v2